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**Attorney for Plaintiffs, TAYLOR D. PENDLETON**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TAYLOR D. PENDLETON, an individual;

Plaintiff,

vs.

10Q LLC, a California Limited Liability

Company PROPELR MUSIC, LLC, an Illinois

Limited Liability Company; MARRIANI

RECORDS, an Illinois corporation; ANTOINE

REED p/k/a “Sir Michael Rocks,” an individual;

and DOES 1 through 5, inclusive,

Defendants.

Case No.: 1:23-cv-04708

**STIPULATION REGARDING PLAINTIFF’S  
TIME TO RESPOND TO MOTIONS**

COMES NOW Plaintiff Taylor D. Pendleton (“Plaintiff”) and Defendants Propelr Music, LLC (“Propelr”), Marrianni Records (“Marrianni”), and Antoine Reed (“Reed”) (collectively, the “Defendants”), by and through their respective counsel of record, and stipulate as follows:

1. Plaintiff filed her Complaint in this Court on July 20, 2023. (Dkt. 1).

2. Plaintiff moved for an entry of default as to Propelr and Marriani on January 4, 2024. (Dkt. 20).

3. This Court entered Rule 55(a) default as to Propelr and Marriani on April 3, 2024. (Dkt. 23).

4. After serving Reed, counsel appeared on behalf of the Defendants in this action and filed a Motion to Set aside [the Rule 55(a) default] as to Propelr and Marriani, and a Motion to Dismiss for Failure to State a claim on behalf of the Defendants on June 28, 2024 (the “Defendants’ Motions”). (Dkt. 30, 31).

5. The Parties have conferred pursuant to this Court’s Rules and Procedures regarding Motion practice, and “in accordance with [this Court’s] standing order, [the parties have] now request[ed] that the Court issue a briefing schedule for the motions.”

6. The parties’ request was sent via a joint email to the Courtroom Deputy on July 3, 2024.

7. Pursuant to the Local Rules, Plaintiff has two (2) weeks to respond to the Defendants’ Motions; however, as the parties have complied with this Court’s rules and procedures, they have/are stipulating to a briefing schedule that is set by this Court.

8. While the parties maintain that this Court’s standing order/instructions supersedes the Local Rules and no briefing schedule has been entered, the parties have agreed to this stipulation so that Plaintiff is not prejudiced from opposing the Defendants’ Motions via a timely response.

9. The parties therefore agree and hereby stipulate to extend the deadlines for Plaintiff to respond to the Defendants’ Motion to 21-days after the date that this Court enters its briefing schedule on the Defendants’ Motions.

IT IS SO STIPULATED.

DATED: July 12, 2024

By: /s/ Kristina Wilson  
KRISTINA WILSON, ESQ.  
Attorneys for Plaintiff, Taylor D. Pendleton

DATED: July 12, 2024

/s/ Ilya Zlatkin

By: \_\_\_\_\_

ILYA ZLATKIN, ESQ.

Attorney for Defendants, *Propelr, Marriani, and Reed*

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